

# Composite Exhibit B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**PLAINTIFF'S FIRST SET OF THREE REQUESTS FOR PRODUCTION TO  
DEFENDANT STEPHEN CURRY**

Plaintiff, pursuant to Fed. R. Civ. P. 26 and 34, requests that Defendant, Stephen Curry  
("Curry"), produce the documents requested in response to these three requests.

Dated: April 21, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

adam@moskowitz-law.com

Joseph M. Kaye

Florida Bar No. 117520

joseph@moskowitz-law.com

**THE MOSKOWITZ LAW FIRM, PLLC**

2 Alhambra Plaza, Suite 601

Coral Gables, FL 33134

Telephone: (305) 740-1423

**By: /s/ David Boies**

David Boies

(*Pro Hac Vice*)

Alex Boies

(*Pro Hac Vice*)

**BOIES SCHILLER FLEXNER LLP**

333 Main Street

Armonk, NY 10504

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
*Case No. 1:22-cv-23753-KMM*

Phone: (914) 749-8200  
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**By: /s/ Stephen Neal Zack**

Stephen Neal Zack

Florida Bar No. 145215

**BOIES SCHILLER FLEXNER LLP**

100 SE 2nd St., Suite 2800

Miami, FL 33131

Office: 305-539-8400

szack@bsflp.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 21, 2023, a true and correct copy of the foregoing was sent via electronic mail to counsel for Defendants.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

### **DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “Curry,” “You,” or “Your” means Defendant Stephen Curry and any of his affiliates, representatives, or agents.
2. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
3. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
4. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.
5. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.
6. “FTX Platform” refers to the FTX Entities’ mobile application cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys,

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*Case No. 1:22-cv-23753-KMM*

charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

9. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

10. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

11. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

12. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

### **INSTRUCTIONS**

1. Production of documents and items requested herein shall be made at the offices of The Moskowitz Law Firm, P.O. Box 141609, Coral Gables, FL 33114, or for hand deliveries at 251 Valencia Ave #141609, Coral Gables, FL 33114, or via electronic mail to the email addresses provided in the signature blocks of the attorneys serving these requests.

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2. These requests shall include all documents that are in the possession, custody or control of Defendant or in the possession, custody or control of the present or former agents, representatives, or attorneys of Defendant, or any and all persons acting on the behalf of Defendant, or its present or former agents, representatives, or attorneys.
3. For any document covered by a request that is withheld from production, Defendant shall provide the following information in the form of a privilege log:
  - a. the reasons and facts supporting any withholding;
  - b. the date such document was prepared;
  - c. the names, employment positions and addresses of the author or preparers of such document;
  - d. the names, employment positions, and the addresses of each person who received such document;
  - e. the title and a brief description of the document; and
  - f. the number of the request under which such document would be produced but for the objection.
4. If any document responsive to a request has been destroyed, produce all documents describing or referencing:
  - a. the contents of the lost or destroyed document;
  - b. all locations in which any copy of the lost or destroyed document had been maintained;
  - c. the date of such loss or destruction;
  - d. the name of each person who ordered, authorized, and carried out the destruction of any responsive document;

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- e. all document retention and destruction policies in effect at the time any requested document was destroyed; and
  - f. all efforts made to locate any responsive document alleged to have been lost.
- 5. In producing the documents requested, indicate the specific request(s) pursuant to which document or group of documents is being produced.
- 6. These requests should be deemed continuing, and supplemental productions should be provided as additional documents become available.
- 7. All documents are to be produced in the following method:
  - a) Single page .TIFF
  - b) Color .jpg (Documents wherein reflection of importance relies on color, shall be produced in .jpg format)
  - c) OCR at document level (All documents are to be provided with searchable text files with the exception of the redacted portions of redacted documents)
  - d) Electronic documents and Emails are to be processed and converted from the electronic format to single page tiff

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### **THREE REQUESTS FOR PRODUCTION**

***Please refer to the Definitions and Instructions when responding to these requests. To the extent that any of these requests seek information considered by Defendants to be confidential, Plaintiff have already agreed to enter into any reasonable confidentiality agreement with Defendants to protect such alleged confidential information.***

1. All Documents and Communications, including contracts or agreements, regarding Your Global Partnership with the FTX Entities. See <https://www.prnewswire.com/news-releases/nba-superstar-stephen-curry-becomes-global-ambassador-and-shareholder-of-leading-cryptocurrency-exchange-ftx-through-long-term-partnership-301370497.html> (accessed April 21, 2023).

2. All Documents and Communications, including but not limited to Contracts or Agreements and any negotiations, that shows, evidences and/or relates to Defendant “targeting” Defendant’s Florida fans, and Florida’s FTX consumers, including but not limited to, through any NFTs You offered for sale on the FTX Platform, or through the extremely well-marketed the “#notanexpert” campaign and Your statements made in that campaign, including “I’m not an expert, *and I don’t need to be*. With FTX I have everything I need to buy, sell, and trade crypto safely.” See <https://www.youtube.com/watch?v=gsy2N-XI04o> (accessed April 21, 2023); see also <https://www.prnewswire.com/news-releases/stephen-curry-drops-surprise-nft-for-charity-to-commemorate-breaking-all-time-nba-three-point-record-301447687.html> (accessed April 21, 2023).

3. All documents regarding any and all communications with the FTX Entities regarding whether YBAs or FTT constitute a security under any federal or state law.



UNITED STATES DISTRICT COURT  
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CASE NO. 1:22-cv-23753-KMM

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themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**PLAINTIFF'S FIRST SET OF THREE REQUESTS FOR PRODUCTION TO  
DEFENDANT LAWRENCE GENE DAVID**

Plaintiff, pursuant to Fed. R. Civ. P. 26 and 34, requests that Defendant, Lawrence Gene David ("David"), produce the documents requested in response to these three requests.

Dated: April 21, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

adam@moskowitz-law.com

Joseph M. Kaye

Florida Bar No. 117520

joseph@moskowitz-law.com

**THE MOSKOWITZ LAW FIRM, PLLC**

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Telephone: (305) 740-1423

**By: /s/ David Boies**

David Boies

(*Pro Hac Vice*)

Alex Boies

(*Pro Hac Vice*)

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**By: /s/ Stephen Neal Zack**

Stephen Neal Zack

Florida Bar No. 145215

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100 SE 2nd St., Suite 2800

Miami, FL 33131

Office: 305-539-8400

szack@bsflp.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 21, 2023, a true and correct copy of the foregoing was sent via electronic mail to counsel for Defendants.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

### **DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “David,” “You,” or “Your” means Defendant Lawrence Gene David and any of his affiliates, representatives, or agents.

2. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.

3. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

4. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.

5. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.

6. “FTX Platform” refers to the FTX Entities’ mobile application cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys,

charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

9. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

10. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

11. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

12. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

### **INSTRUCTIONS**

1. Production of documents and items requested herein shall be made at the offices of The Moskowitz Law Firm, P.O. Box 141609, Coral Gables, FL 33114, or for hand deliveries at 251 Valencia Ave #141609, Coral Gables, FL 33114, or via electronic mail to the email addresses provided in the signature blocks of the attorneys serving these requests.

2. These requests shall include all documents that are in the possession, custody or control of Defendant or in the possession, custody or control of the present or former agents, representatives, or attorneys of Defendant, or any and all persons acting on the behalf of Defendant, or its present or former agents, representatives, or attorneys.
3. For any document covered by a request that is withheld from production, Defendant shall provide the following information in the form of a privilege log:
  - a. the reasons and facts supporting any withholding;
  - b. the date such document was prepared;
  - c. the names, employment positions and addresses of the author or preparers of such document;
  - d. the names, employment positions, and the addresses of each person who received such document;
  - e. the title and a brief description of the document; and
  - f. the number of the request under which such document would be produced but for the objection.
4. If any document responsive to a request has been destroyed, produce all documents describing or referencing:
  - a. the contents of the lost or destroyed document;
  - b. all locations in which any copy of the lost or destroyed document had been maintained;
  - c. the date of such loss or destruction;
  - d. the name of each person who ordered, authorized, and carried out the destruction of any responsive document;

- e. all document retention and destruction policies in effect at the time any requested document was destroyed; and
  - f. all efforts made to locate any responsive document alleged to have been lost.
- 5. In producing the documents requested, indicate the specific request(s) pursuant to which document or group of documents is being produced.
- 6. These requests should be deemed continuing, and supplemental productions should be provided as additional documents become available.
- 7. All documents are to be produced in the following method:
  - a) Single page .TIFF
  - b) Color .jpg (Documents wherein reflection of importance relies on color, shall be produced in .jpg format)
  - c) OCR at document level (All documents are to be provided with searchable text files with the exception of the redacted portions of redacted documents)
  - d) Electronic documents and Emails are to be processed and converted from the electronic format to single page tiff

**THREE REQUESTS FOR PRODUCTION**

***Please refer to the Definitions and Instructions when responding to these requests. To the extent that any of these requests seek information considered by Defendants to be confidential, Plaintiff have already agreed to enter into any reasonable confidentiality agreement with Defendants to protect such alleged confidential information.***

1. All Documents and Communications, including contracts or agreements, regarding any business You conducted with the FTX Entities.
2. All Documents and Communications, that show, evidence and/or relate to Defendant “targeting” Defendant’s Florida fans, and Florida’s FTX consumers, including but not limited to the “Don’t Miss Out on Crypto” 2022 Super Bowl advertisement. *See* <https://youtu.be/hWMnbJJpeZc> (accessed April 21, 2023).
3. All documents regarding any and all communications with the FTX Entities regarding whether YBAs or FTT constitute a security under any federal or state law.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**PLAINTIFF'S FIRST SET OF THREE REQUESTS FOR PRODUCTION TO  
DEFENDANT GOLDEN STATE WARRIORS LLC**

Plaintiff, pursuant to Fed. R. Civ. P. 26 and 34, requests that Defendant, Golden State Warriors LLC ("GSW"), produce the documents requested in response to these three requests.

Dated: April 21, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

adam@moskowitz-law.com

Joseph M. Kaye

Florida Bar No. 117520

joseph@moskowitz-law.com

**THE MOSKOWITZ LAW FIRM, PLLC**

2 Alhambra Plaza, Suite 601

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Telephone: (305) 740-1423

**By: /s/ David Boies**

David Boies

(*Pro Hac Vice*)

Alex Boies

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**BOIES SCHILLER FLEXNER LLP**

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Armonk, NY 10504



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Case No. 1:22-cv-23753-KMM

Phone: (914) 749-8200  
dboies@bsfllp.com

**By: /s/ Stephen Neal Zack**

Stephen Neal Zack

Florida Bar No. 145215

**BOIES SCHILLER FLEXNER LLP**

100 SE 2nd St., Suite 2800

Miami, FL 33131

Office: 305-539-8400

szack@bsfllp.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 21, 2023, a true and correct copy of the foregoing was sent via electronic mail to counsel for Defendants.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

### **DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “GSW,” “You,” or “Your” means Defendant Golden State Warriors LLC and any of its affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.

2. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.

3. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

4. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.

5. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.

6. “FTX Platform” refers to the FTX Entities’ mobile application cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and

intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys, charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

9. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

10. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

11. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

12. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

### **INSTRUCTIONS**

1. Production of documents and items requested herein shall be made at the offices of The Moskowitz Law Firm, P.O. Box 141609, Coral Gables, FL 33114, or for hand deliveries at 251 Valencia Ave #141609, Coral Gables, FL 33114, or via electronic mail to the email

addresses provided in the signature blocks of the attorneys serving these requests.

2. These requests shall include all documents that are in the possession, custody or control of Defendant or in the possession, custody or control of the present or former agents, representatives, or attorneys of Defendant, or any and all persons acting on the behalf of Defendant, or its present or former agents, representatives, or attorneys.
3. For any document covered by a request that is withheld from production, Defendant shall provide the following information in the form of a privilege log:
  - a. the reasons and facts supporting any withholding;
  - b. the date such document was prepared;
  - c. the names, employment positions and addresses of the author or preparers of such document;
  - d. the names, employment positions, and the addresses of each person who received such document;
  - e. the title and a brief description of the document; and
  - f. the number of the request under which such document would be produced but for the objection.
4. If any document responsive to a request has been destroyed, produce all documents describing or referencing:
  - a. the contents of the lost or destroyed document;
  - b. all locations in which any copy of the lost or destroyed document had been maintained;
  - c. the date of such loss or destruction;
  - d. the name of each person who ordered, authorized, and carried out

- the destruction of any responsive document;
  - e. all document retention and destruction policies in effect at the time any requested document was destroyed; and
  - f. all efforts made to locate any responsive document alleged to have been lost.
5. In producing the documents requested, indicate the specific request(s) pursuant to which document or group of documents is being produced.
6. These requests should be deemed continuing, and supplemental productions should be provided as additional documents become available.
7. All documents are to be produced in the following method:
- a) Single page .TIFF
  - b) Color .jpg (Documents wherein reflection of importance relies on color, shall be produced in .jpg format)
  - c) OCR at document level (All documents are to be provided with searchable text files with the exception of the redacted portions of redacted documents)
  - d) Electronic documents and Emails are to be processed and converted from the electronic format to single page tiff

### **THREE REQUESTS FOR PRODUCTION**

***Please refer to the Definitions and Instructions when responding to these requests. To the extent that any of these requests seek information considered by Defendants to be confidential, Plaintiff have already agreed to enter into any reasonable confidentiality agreement with Defendants to protect such alleged confidential information.***

1. All Documents and Communications, including but not limited to contracts or agreements, regarding Your “First-Of-Its-Kind” International Partnership with the FTX Entities. See <https://www.nba.com/warriors/warriors-ftx-partnership-20211214> (accessed April 21, 2023).

2. All Documents and Communications, that show, evidence and/or relate to Defendant “targeting” Defendant’s Florida fans, and Florida’s FTX consumers, including but not limited to (1) any advertising for the FTX Platform or FTX Entities located in the Chase Center that was broadcast in or viewable by Florida investors and GSW fans residing in Florida during GSW games (including GSW home games where GSW played either the Miami Heat or Orlando Magic); (2) any advertising for the FTX Platform or FTX Entities located in the Warriors Gaming Squad court during NBA 2K League games; and (3) any NFTs that GSW offered for sale on the FTX Platform.

3. All documents regarding any and all communications with the FTX Entities regarding whether YBAs or FTT constitute a security under any federal or state law.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**PLAINTIFF'S FIRST SET OF THREE REQUESTS FOR PRODUCTION TO  
DEFENDANT SHOHEI OHTANI**

Plaintiff, pursuant to Fed. R. Civ. P. 26 and 34, requests that Defendant, Shohei Ohtani  
("Ohtani"), produce the documents requested in response to these three requests.

Dated: April 21, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

adam@moskowitz-law.com

Joseph M. Kaye

Florida Bar No. 117520

joseph@moskowitz-law.com

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**By: /s/ David Boies**

David Boies

(*Pro Hac Vice*)

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**By: /s/ Stephen Neal Zack**

Stephen Neal Zack

Florida Bar No. 145215

**BOIES SCHILLER FLEXNER LLP**

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Miami, FL 33131

Office: 305-539-8400

szack@bsfllp.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 21, 2023, a true and correct copy of the foregoing was sent via electronic mail to counsel for Defendants.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ



### **DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “Ohtani,” “You,” or “Your” means Defendant Shohei Ohtani and any of his affiliates, representatives, or agents.
2. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
3. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
4. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.
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6. “FTX Platform” refers to the FTX Entities’ mobile application cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys,

charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

9. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

10. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

11. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

12. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

### **INSTRUCTIONS**

1. Production of documents and items requested herein shall be made at the offices of The Moskowitz Law Firm, P.O. Box 141609, Coral Gables, FL 33114, or for hand deliveries at 251 Valencia Ave #141609, Coral Gables, FL 33114, or via electronic mail to the email addresses provided in the signature blocks of the attorneys serving these requests.

2. These requests shall include all documents that are in the possession, custody or control of Defendant or in the possession, custody or control of the present or former agents, representatives, or attorneys of Defendant, or any and all persons acting on the behalf of Defendant, or its present or former agents, representatives, or attorneys.
3. For any document covered by a request that is withheld from production, Defendant shall provide the following information in the form of a privilege log:
  - a. the reasons and facts supporting any withholding;
  - b. the date such document was prepared;
  - c. the names, employment positions and addresses of the author or preparers of such document;
  - d. the names, employment positions, and the addresses of each person who received such document;
  - e. the title and a brief description of the document; and
  - f. the number of the request under which such document would be produced but for the objection.
4. If any document responsive to a request has been destroyed, produce all documents describing or referencing:
  - a. the contents of the lost or destroyed document;
  - b. all locations in which any copy of the lost or destroyed document had been maintained;
  - c. the date of such loss or destruction;
  - d. the name of each person who ordered, authorized, and carried out the destruction of any responsive document;

- e. all document retention and destruction policies in effect at the time any requested document was destroyed; and
  - f. all efforts made to locate any responsive document alleged to have been lost.
- 5. In producing the documents requested, indicate the specific request(s) pursuant to which document or group of documents is being produced.
- 6. These requests should be deemed continuing, and supplemental productions should be provided as additional documents become available.
- 7. All documents are to be produced in the following method:
  - a) Single page .TIFF
  - b) Color .jpg (Documents wherein reflection of importance relies on color, shall be produced in .jpg format)
  - c) OCR at document level (All documents are to be provided with searchable text files with the exception of the redacted portions of redacted documents)
  - d) Electronic documents and Emails are to be processed and converted from the electronic format to single page tiff

### **THREE REQUESTS FOR PRODUCTION**

***Please refer to the Definitions and Instructions when responding to these requests. To the extent that any of these requests seek information considered by Defendants to be confidential, Plaintiff have already agreed to enter into any reasonable confidentiality agreement with Defendants to protect such alleged confidential information.***

1. All Documents and Communications, including contracts or agreements, regarding Your Global Partnership with the FTX Entities. See <https://www.prnewswire.com/news-releases/mlb-superstar-shohei-ohtani-joins-ftx-as-global-ambassador-through-long-term-partnership-301425911.html> (accessed April 21, 2023).

2. All Documents and Communications, that show, evidence and/or relate to Defendant “targeting” Defendant’s Florida fans, and Florida’s FTX consumers, including but not limited to the “Shohei Does it All” advertising campaign. See <https://www.youtube.com/watch?v=Is72XSKuUqA> (accessed April 21, 2023).

3. All documents regarding any and all communications with the FTX Entities regarding whether YBAs or FTT constitute a security under any federal or state law.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**PLAINTIFF'S FIRST SET OF THREE REQUESTS FOR PRODUCTION TO  
DEFENDANT NAOMI OSAKA**

Plaintiff, pursuant to Fed. R. Civ. P. 26 and 34, requests that Defendant, Naomi Osaka  
("Osaka"), produce the documents requested in response to these three requests.

Dated: April 21, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

adam@moskowitz-law.com

Joseph M. Kaye

Florida Bar No. 117520

joseph@moskowitz-law.com

**THE MOSKOWITZ LAW FIRM, PLLC**

2 Alhambra Plaza, Suite 601

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**By: /s/ David Boies**

David Boies

(*Pro Hac Vice*)

Alex Boies

(*Pro Hac Vice*)

**BOIES SCHILLER FLEXNER LLP**

333 Main Street

Armonk, NY 10504

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
Case No. 1:22-cv-23753-KMM

Phone: (914) 749-8200  
dboies@bsfllp.com

**By: /s/ Stephen Neal Zack**

Stephen Neal Zack

Florida Bar No. 145215

**BOIES SCHILLER FLEXNER LLP**

100 SE 2nd St., Suite 2800

Miami, FL 33131

Office: 305-539-8400

szack@bsfllp.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 21, 2023, a true and correct copy of the foregoing was sent via electronic mail to counsel for Defendants.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

### **DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “Osaka,” “You,” or “Your” means Defendant Naomi Osaka and any of her affiliates, representatives, or agents.

2. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.

3. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

4. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.

5. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.

6. “FTX Platform” refers to the FTX Entities’ mobile application cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys,



charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

9. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

10. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

11. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

12. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

### **INSTRUCTIONS**

1. Production of documents and items requested herein shall be made at the offices of The Moskowitz Law Firm, P.O. Box 141609, Coral Gables, FL 33114, or for hand deliveries at 251 Valencia Ave #141609, Coral Gables, FL 33114, or via electronic mail to the email addresses provided in the signature blocks of the attorneys serving these requests.

2. These requests shall include all documents that are in the possession, custody or control of Defendant or in the possession, custody or control of the present or former agents, representatives, or attorneys of Defendant, or any and all persons acting on the behalf of Defendant, or its present or former agents, representatives, or attorneys.
3. For any document covered by a request that is withheld from production, Defendant shall provide the following information in the form of a privilege log:
  - a. the reasons and facts supporting any withholding;
  - b. the date such document was prepared;
  - c. the names, employment positions and addresses of the author or preparers of such document;
  - d. the names, employment positions, and the addresses of each person who received such document;
  - e. the title and a brief description of the document; and
  - f. the number of the request under which such document would be produced but for the objection.
4. If any document responsive to a request has been destroyed, produce all documents describing or referencing:
  - a. the contents of the lost or destroyed document;
  - b. all locations in which any copy of the lost or destroyed document had been maintained;
  - c. the date of such loss or destruction;
  - d. the name of each person who ordered, authorized, and carried out the destruction of any responsive document;

- e. all document retention and destruction policies in effect at the time any requested document was destroyed; and
  - f. all efforts made to locate any responsive document alleged to have been lost.
- 5. In producing the documents requested, indicate the specific request(s) pursuant to which document or group of documents is being produced.
- 6. These requests should be deemed continuing, and supplemental productions should be provided as additional documents become available.
- 7. All documents are to be produced in the following method:
  - a) Single page .TIFF
  - b) Color .jpg (Documents wherein reflection of importance relies on color, shall be produced in .jpg format)
  - c) OCR at document level (All documents are to be provided with searchable text files with the exception of the redacted portions of redacted documents)
  - d) Electronic documents and Emails are to be processed and converted from the electronic format to single page tiff

### **THREE REQUESTS FOR PRODUCTION**

***Please refer to the Definitions and Instructions when responding to these requests. To the extent that any of these requests seek information considered by Defendants to be confidential, Plaintiff have already agreed to enter into any reasonable confidentiality agreement with Defendants to protect such alleged confidential information.***

1. All Documents and Communications, including contracts or agreements, regarding Your Global Partnership with the FTX Entities. See <https://www.prnewswire.com/news-releases/naomi-osaka-world-renowned-tennis-player-and-activist-becomes-global-ambassador-and-shareholder-of-ftx-with-long-term-partnership-to-increase-access-and-opportunity-for-women-in-crypto-301506633.html> (accessed April 21, 2023).

2. All Documents and Communications, that show, evidence and/or relate to Defendant “targeting” Defendant’s Florida fans, and Florida’s FTX consumers, including but not limited to, (1) through wearing the FTX logo on the kit Defendant wore at tournaments, including the 2022 Miami Open, and (2) through any and all content you directed, created, produced, or participated in in association with the FTX Entities designed to promote the FTX Platform, FTT, and/or YBAs, such as the advertisement viewable here: <https://youtu.be/pkuf8avR50k> (accessed April 21, 2023).

3. All documents regarding any and all communications with the FTX Entities regarding whether YBAs or FTT constitute a security under any federal or state law.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF DEFENDANT  
GOLDEN STATE WARRIORS LLC'S RULE 30(b)(6) REPRESENTATIVE(S)**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Golden State Warriors LLC, (the "GSW"), by and through GSW' corporate representative(s) with knowledge of the four topics listed in **Exhibit A**, pursuant to Federal Rule of Civil Procedure 30(b)(6).

**DATE:** July 17, 2023

**TIME:** 10:00 AM (PDT) // 1:00 PM (EDT)

**LOCATION:** Boies, Schiller Flexner, LLP  
44 Montgomery Street  
41st Floor  
San Francisco, CA 94104  
Phone 415 293 6800

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of California. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
Case No. 1:22-cv-23753-KMM

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Golden State Warriors LLC (the “GSW”) shall both designate one or more officers, directors, managing agents, or other persons to testify on its behalf on each topic listed on **Exhibit A** attached hereto.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
**THE MOSKOWITZ LAW FIRM, PLLC**  
3250 Mary Street, Suite 202  
Miami, FL 33133  
Mailing Address:  
P.O. Box 653409  
Miami, FL 33175  
Telephone: (305) 740-1423  
adam@moskowitz-law.com  
joseph@moskowitz-law.com

**By: /s/ David Boies**

David Boies  
(*Pro Hac Vice*)  
Alex Boies  
(*Pro Hac Vice*)  
**BOIES SCHILLER FLEXNER LLP**  
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Phone: (914) 749-8200  
dboies@bsflp.com

**By: /s/ Stephen Neal Zack**

Stephen Neal Zack  
Florida Bar No. 145215  
**BOIES SCHILLER FLEXNER LLP**  
100 SE 2nd St., Suite 2800  
Miami, FL 33131  
Office: 305-539-8400  
szack@bsflp.com

**By: /s/ Jose M. Ferrer**

Jose Ferrer  
Florida Bar No. 173746

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
*Case No. 1:22-cv-23753-KMM*

Michelle Genet Bernstein  
Florida Bar No. 1030736  
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Miami, FL 33130  
Office: 305-374-0440  
jose@markmigdal.com  
michelle@markmigdal.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the forgoing was served on May 26, 2023, via email to all attorneys of record.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

## **EXHIBIT A**

### **I. DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “GSW,” “You,” or “Your” means Defendant, Golden State Warriors LLC, any of its affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
2. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
3. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
4. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.
5. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.
6. “FTX Platform” refers to the FTX Entities’ mobile application cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes,



agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys, charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

9. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

10. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

11. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

12. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

## **II. FOUR DEPOSITION SUBJECTS**

Pursuant to Rule 30(b)(6), the GSW shall designate and produce for deposition one or more of its officers, directors, managing agents, or other persons who are knowledgeable about and consent to testify on its behalf concerning the following subject matters:

1. All Documents and responses provided in response to Plaintiffs' request for production, each dated and served on April 21, 2023.
2. All contracts or agreements and circumstances regarding Your "First-Of-Its-Kind" International Partnership with the FTX Entities. See <https://www.nba.com/warriors/warriors-ftx-partnership-20211214> (accessed April 21, 2023).
3. All Documents and Communications, that show, evidence and/or relate to Defendant "targeting" Defendant's Florida fans, and Florida's FTX consumers, including but not limited to (1) any advertising for the FTX Platform or FTX Entities located in the Chase Center that was broadcast in or viewable by Florida investors and GSW fans residing in Florida during GSW games (including GSW home games where GSW played either the Miami Heat or Orlando Magic); (2) any advertising for the FTX Platform or FTX Entities located in the Warriors Gaming Squad court during NBA 2K League games; and (3) any NFTs that GSW offered for sale on the FTX Platform.
4. All research or due diligence YOU and/or the NBA performed about the FTX Entities, the FTX Platform, or whether YBAs or FTT constitute a security under any federal or state law.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT THOMAS BRADY**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Thomas Brady  
**DATE:** July 27, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
*Case No. 1:22-cv-23753-KMM*

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Miami, FL 33133  
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P.O. Box 653409  
Miami, FL 33175  
Telephone: (305) 740-1423  
adam@moskowitz-law.com  
joseph@moskowitz-law.com

**By: /s/ David Boies**

David Boies  
(*Pro Hac Vice*)  
Alex Boies  
(*Pro Hac Vice*)

**BOIES SCHILLER FLEXNER LLP**

333 Main Street  
Armonk, NY 10504  
Phone: (914) 749-8200  
dboies@bsflp.com

**By: /s/ Stephen Neal Zack**

Stephen Neal Zack  
Florida Bar No. 145215  
**BOIES SCHILLER FLEXNER LLP**  
100 SE 2nd St., Suite 2800  
Miami, FL 33131  
Office: 305-539-8400  
szack@bsflp.com

**By: /s/ Jose M. Ferrer**

Jose Ferrer  
Florida Bar No. 173746  
Michelle Genet Bernstein  
Florida Bar No. 1030736  
**MARK MIGDAL HAYDEN LLP**  
80 SW 8th Street, Suite 1999  
Miami, FL 33130  
Office: 305-374-0440  
jose@markmigdal.com  
michelle@markmigdal.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the forgoing was served on May 26, 2023, via email to all attorneys of record.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT GISELE BUNDCHEN**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Gisele Bundchen  
**DATE:** July 26, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
*Case No. 1:22-cv-23753-KMM*

3250 Mary Street, Suite 202  
Miami, FL 33133  
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P.O. Box 653409  
Miami, FL 33175  
Telephone: (305) 740-1423  
adam@moskowitz-law.com  
joseph@moskowitz-law.com

**By: /s/ David Boies**

David Boies  
(*Pro Hac Vice*)  
Alex Boies  
(*Pro Hac Vice*)

**BOIES SCHILLER FLEXNER LLP**

333 Main Street  
Armonk, NY 10504  
Phone: (914) 749-8200  
dboies@bsflp.com

**By: /s/ Stephen Neal Zack**

Stephen Neal Zack  
Florida Bar No. 145215  
**BOIES SCHILLER FLEXNER LLP**  
100 SE 2nd St., Suite 2800  
Miami, FL 33131  
Office: 305-539-8400  
szack@bsflp.com

**By: /s/ Jose M. Ferrer**

Jose Ferrer  
Florida Bar No. 173746  
Michelle Genet Bernstein  
Florida Bar No. 1030736  
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Miami, FL 33130  
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jose@markmigdal.com  
michelle@markmigdal.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the forgoing was served on May 26, 2023, via email to all attorneys of record.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT STEPHEN CURRY**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Stephen Curry  
**DATE:** July 13, 2023  
**TIME:** 10:00 AM (PDT) // 1:00 PM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
725 S Figueroa Street, 31st Floor  
Los Angeles, CA 90017  
Phone (213) 629-9040

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of California. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
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3250 Mary Street, Suite 202  
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adam@moskowitz-law.com  
joseph@moskowitz-law.com

**By: /s/ David Boies**

David Boies  
(*Pro Hac Vice*)  
Alex Boies  
(*Pro Hac Vice*)

**BOIES SCHILLER FLEXNER LLP**

333 Main Street  
Armonk, NY 10504  
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**By: /s/ Stephen Neal Zack**

Stephen Neal Zack  
Florida Bar No. 145215  
**BOIES SCHILLER FLEXNER LLP**  
100 SE 2nd St., Suite 2800  
Miami, FL 33131  
Office: 305-539-8400  
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**By: /s/ Jose M. Ferrer**

Jose Ferrer  
Florida Bar No. 173746  
Michelle Genet Bernstein  
Florida Bar No. 1030736  
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Office: 305-374-0440  
jose@markmigdal.com  
michelle@markmigdal.com

*Co-Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the forgoing was served on May 26, 2023, via email to all attorneys of record.

By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT LAWRENCE GENE DAVID**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Lawrence Gene David  
**DATE:** July 10, 2023  
**TIME:** 10:00 AM (PDT) // 1:00 PM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
725 S Figueroa Street, 31st Floor  
Los Angeles, CA 90017  
Phone (213) 629-9040

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of California. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
*Case No. 1:22-cv-23753-KMM*

3250 Mary Street, Suite 202  
Miami, FL 33133  
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joseph@moskowitz-law.com

**By: /s/ David Boies**

David Boies  
(*Pro Hac Vice*)  
Alex Boies  
(*Pro Hac Vice*)

**BOIES SCHILLER FLEXNER LLP**

333 Main Street  
Armonk, NY 10504  
Phone: (914) 749-8200  
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**By: /s/ Stephen Neal Zack**

Stephen Neal Zack  
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**BOIES SCHILLER FLEXNER LLP**  
100 SE 2nd St., Suite 2800  
Miami, FL 33131  
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szack@bsflp.com

**By: /s/ Jose M. Ferrer**

Jose Ferrer  
Florida Bar No. 173746  
Michelle Genet Bernstein  
Florida Bar No. 1030736  
**MARK MIGDAL HAYDEN LLP**  
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*Co-Counsel for Plaintiff and the Class*

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
Case No. 1:22-cv-23753-KMM

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ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT UDONIS HASLEM**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Udonis Haslem  
**DATE:** July 20, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

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*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
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*Co-Counsel for Plaintiff and the Class*



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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT WILLIAM TREVOR LAWRENCE**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant William Trevor Lawrence  
**DATE:** July 21, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 30, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

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*Co-Counsel for Plaintiff and the Class*

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By: /s/ Adam M. Moskowitz  
ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT SHOHEI OHTANI**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Shohei Ohtani  
**DATE:** July 12, 2023  
**TIME:** 10:00 AM (PDT) // 1:00 PM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
725 S Figueroa Street, 31st Floor  
Los Angeles, CA 90017  
Phone (213) 629-9040

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Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

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*Co-Counsel for Plaintiff and the Class*

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ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT KEVIN O'LEARY**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Kevin O'Leary  
**DATE:** July 28, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**



*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
Case No. 1:22-cv-23753-KMM

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**By: /s/ Stephen Neal Zack**

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**By: /s/ Jose M. Ferrer**

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Florida Bar No. 173746  
Michelle Genet Bernstein  
Florida Bar No. 1030736  
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*Co-Counsel for Plaintiff and the Class*

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ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT SHAQUILLE O'NEAL**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Shaquille O'Neal  
**DATE:** July 24, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
*Case No. 1:22-cv-23753-KMM*

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(*Pro Hac Vice*)  
Alex Boies  
(*Pro Hac Vice*)

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**By: /s/ Jose M. Ferrer**

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*Co-Counsel for Plaintiff and the Class*

*Edwin Garrison, et al. v. Samuel Bankman-Fried, et al.*  
Case No. 1:22-cv-23753-KMM

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ADAM M. MOSKOWITZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT NAOMI OSAKA**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Naomi Osaka  
**DATE:** July 11, 2023  
**TIME:** 10:00 AM (PDT) // 1:00 PM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
725 S Figueroa Street, 31st Floor  
Los Angeles, CA 90017  
Phone (213) 629-9040

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Dated: May 26, 2023

Respectfully submitted,

By: /s/ Adam Moskowitz

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

**THE MOSKOWITZ LAW FIRM, PLLC**

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*Case No. 1:22-cv-23753-KMM*

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**By: /s/ Jose M. Ferrer**

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*Co-Counsel for Plaintiff and the Class*

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ADAM M. MOSKOWITZ



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:22-cv-23753-KMM

EDWIN GARRISON, *et al.*, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

SAM BANKMAN-FRIED, *et al.*,

*Defendants.*

/

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT DAVID ORTIZ**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant David Ortiz  
**DATE:** July 25, 2023  
**TIME:** 10:00 AM (EDT)  
**LOCATION:** Boies, Schiller Flexner, LLP  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., Suite 2800  
Miami, FL 33131

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Dated: May 26, 2023

Respectfully submitted,

**By: /s/ Adam Moskowitz**

Adam M. Moskowitz

Florida Bar No. 984280

Joseph M. Kaye

Florida Bar No. 117520

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*Co-Counsel for Plaintiff and the Class*

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